

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

ILLINOIS BANKERS ASSOCIATION,
AMERICAN BANKERS ASSOCIATION,
AMERICA’S CREDIT UNIONS, and
ILLINOIS CREDIT UNION LEAGUE,

Plaintiffs,

v.

KWAME RAOUL, in his official capacity as
Illinois Attorney General,

Defendant.

Case No. 1:24-cv-07307

Hon. Virginia M. Kendall

**PLAINTIFFS’ UNOPPOSED MOTION FOR LEAVE TO FILE
A 20-PAGE REPLY IN SUPPORT OF THEIR
MOTION FOR A PRELIMINARY INJUNCTION**

Plaintiffs Illinois Bankers Association (“IBA”), American Bankers Association (“ABA”), America’s Credit Unions (“ACU”), and Illinois Credit Union League (“ICUL”), by and through their attorneys, respectfully submit this unopposed motion for leave to file a 20-page reply in support of Plaintiffs’ Motion for a Preliminary Injunction, which is due on October 11, 2024. In support of this motion, Plaintiffs state as follows:

1. On August 20, 2024, Plaintiffs filed a Motion for a Preliminary Injunction seeking to enjoin Defendant Kwame Raoul, in his official capacity as Illinois Attorney General, from enforcing the IFPA as to any “issuer,” “payment card network,” “acquirer bank,” “processor,” or “other designated entity,” *see* 815 ILCS 151/150-10(a), 150-15(a), as well as any other participants in the payment system needed to afford complete relief while this case is pending (Dckt. No. 15).

2. On August 21, 2024, Plaintiffs filed a 40-page memorandum in support of their Motion for a Preliminary Injunction with the Court’s leave and without opposition by Defendant (Dckt. No. 24).

3. On October 4, 2024, Defendant filed a 40-page combined memorandum in opposition to Plaintiffs' Motion for a Preliminary Injunction and in support of Defendant's Motion to Dismiss with the Court's leave and without opposition by Plaintiffs (Dekt. No. 76).

4. After reviewing Defendant's opposition brief, Plaintiffs believe that a combined reply in support of Plaintiffs' Motion for a Preliminary Injunction and in opposition to Defendant's Motion to Dismiss of twenty (20) pages is necessary to respond to Defendant's arguments. If this motion is granted, Plaintiffs' twenty (20) page combined memorandum will include a table of contents and table of cases as required by Local Rule 7.1.

5. On October 7, 2024, Plaintiffs' counsel conferred with Defendant's counsel regarding this motion for leave to file excess pages. Defendant's counsel informed Plaintiffs' counsel that it does not oppose this motion.

WHEREFORE, for the above-described reasons, Plaintiffs IBA, ABA, ACU, and ICUL respectfully request that the Court grant their unopposed motion for leave to file a 20-page reply in support of Plaintiffs' Motion for a Preliminary Injunction.

Dated: October 7, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on October 7, 2024, a copy of the foregoing was filed using the CM/ECF system, which will effectuate service on all counsel of record.

/s/ Bethany K. Biesenthal

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